Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of **DELETE, DELETE, DELETE**	)	GN Docket No. 25-133

COMMENTS OF SPACE EXPLORATION HOLDINGS, LLC

Winning the new space race requires the Commission to take bold action to replace antiquated command-and-control rules and procedures with a fast, flexible, and efficient regulatory framework that can keep pace with rapidly evolving satellite technology and accelerating consumer demand for high-speed, low-latency broadband. Fortunately, much of this command-and-control regime lies in practice, not rule, providing this Commission with an opportunity to immediately upgrade its satellite licensing regime and deliver enhanced satellite broadband to consumers. For upgrades that do require rule changes, pending rulemaking dockets provide further opportunities to unshackle next-generation satellite systems from outdated requirements designed by and for legacy satellite systems that differ significantly from next-generation satellite systems.

But consistent with its statutory mandate and the Chairman's goals in establishing this proceeding,[1] the Commission can and should do more to update its rules. To that end, the Commission should also swiftly initiate new rulemaking proceedings to modernize outdated protections for legacy GSO systems, open mid-band mobile satellite spectrum for more efficient and intensive sharing, and establish a robust satellite spectrum pipeline. In so doing, the

[1] *See* Public Notice, *In re: Delete, Delete, Delete*, DA 25-219 (rel. Mar. 12, 2025) ("Public Notice").

Commission can ensure that all Americans have access to high-speed, low-latency broadband no matter where they are, and set a strong foundation for America to win in 6G as it did in 5G.

Upgrade space station and earth station licensing procedures for the new space age. The Commission can achieve many of the goals of this Public Notice without any changes to its rules, delivering immediate benefits to millions of American consumers and promoting American space leadership and competitiveness abroad. For example, the Commission should:

- Establish internal shot clocks for final action taken on space station and earth station applications and modifications consistent with those the Commission adopted for terrestrial wireless siting—e.g., 60 days following the close of the comment period;
- Presume that granting certain requests in a space station or earth station application would serve the public interest, including (1) requests to operate within existing Part 25 technical rules and (2) requests to waive outdated or spectrally inefficient technical limits;
- Require U.S.-based satellite companies who have sought to evade Commission oversight by seeking licenses from foreign jurisdictions to withdraw any associated U.S. market access applications and instead refile those applications as U.S. space station applications for new systems;
- Decline NGSO deployment milestone extensions except in extremely rare and truly unforeseeable circumstances that warrant a very brief extension; instead, treat any satellites deployed after the milestone date as a new system in a subsequent processing round;
- Update outdated guidance and procedures for demonstrating maximum permissible exposure limits to account for innovation in earth station equipment, including electronically steerable antennas; and
- Eliminate case-by-case application reviews, information requests, and bespoke license conditions that invite regulatory gamesmanship, last-minute surprises, and unnecessary or harmful technical constraints on next-generation satellite systems.

Adopt final orders in pending rulemaking proceedings to promote efficient spectrum sharing, satellite innovation, and consumer value. The Commission can further upgrade its space station and earth station licensing rules for the new space age by expeditiously adopting streamlining proposals in several long-pending rulemaking dockets that find support and are ripe for decision. For example, the Commission should update its rules to:

- Permit NGSO systems to modify their licenses without prior Commission approval so long as the modification continues to meet Commission rules and would not cause significant interference problems for other systems;

- Protect the broadband service of millions of Americans who rely of next-generation satellite services by rejecting demands to inject harmful high-power terrestrial services in and adjacent to the workhorse 12 GHz band;

- Replace outdated pre-coordination and site-by-site licensing rules with an efficient, self-coordinated "light-licensing" framework for upper millimeter-wave spectrum bands shared on a co-primary basis between satellite and terrestrial operators;

- Eliminate burdensome and unnecessary supplemental coverage from space requirements that create needless risks for consumers and first responders in emergency situations, including duplicative device certification requirements for legacy handsets; and

- Establish clear, strong, performance-based orbital debris mitigation rules that apply equally to all operators in place of case-by-case reviews and bespoke conditions, building upon the Commission's unanimous decision in SpaceX's *Gen2 Order*.[2]

Initiate new rulemaking proceedings to promote more efficient sharing in existing bands and establish a satellite spectrum pipeline to enable future innovation. The Commission should initiate and complete new rulemaking proceedings to modernize outdated and spectrally inefficient technical rules that harm consumers by limiting competition, coordination, and service quality. Among other opportunities, the Commission should:

- Update service and sharing rules for the Mobile-Satellite Service in essential mid-band satellite spectrum to promote new competition, more efficient sharing, and enhanced service quality for American consumers, enterprises, and first responders;

- Sunset outdated protections for legacy satellite systems—ossified in equivalent power flux-density ("EPFD") limits—that the Commission has found are inefficient and harm next-generation satellite service quality, competition, and coordination; and

- Propose a robust satellite spectrum pipeline to support gigabit-speed, low-latency satellite broadband and 6G connectivity, including by promoting flexible use of satellite spectrum, removing outdated restrictions on existing Fixed-Satellite Service allocations, and adding new satellite uplink allocations for emerging frequency bands above 95 GHz.

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[2] *See Space Exploration Holdings, LLC,* 37 FCC Rcd. 14882 (2022) ("*Gen2 Order*").

By adopting these common-sense updates to its rules, procedures, and policies—all of which find support in existing Commission rulemaking and licensing proceedings—Chairman Carr and the Space Bureau can set a strong foundation for rapid innovation and deployment of next-generation satellite services for millions of people and ensure that the United States space industry remains the envy of the world.

Respectfully submitted,

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